# KEYSTONE SANITATION SITE ADMINISTRATIVE RECORD FILE \* \* FOR THE DE MICROMIS SETTLEMENTS LODGED OCTOBER 1998 INDEX OF DOCUMENTS

# II. PRP DOCUMENTS

## Allen's Kartway

- 1. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Allen's Kartway, 1/31/96. P. ALL0001-ALL0006.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Allen's Kartway, 1/31/96. P. ALL0007-ALL0007.
- \*\*\* 3. Letter to Ms. Molly Hall, U.S. Department of Justice (DOJ), from Ms. Robyn Katzman, Mette, Evans & Woodside, re: Response to EPA's April 30, 1996, request for additional information concerning the EPA questionnaire, 7/11/96. P. ALL0008-ALL0010.
  - 4. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Allen's Kartway, 7/20/98. P. ALL0011-ALL0011.

# Andgrow Fertilizer

- \* Administrative Record File available 10/13/98.
- \*\* This Index of Documents for the De Micromis Settlements Lodged October 1998 hereby incorporates by reference all documents contained in the Keystone Sanitation Landfill Administrative Record for the De Micromis Settlements Lodged On April 5, 1996, and the Keystone Sanitation Landfill Administrative Record for the De Micromis Settlements Lodged On May 3, 1996.
- EPA has redacted this document to protect against the disclosure of privileged and confidential information.

  The redaction is evident from the face of the document.

- 1. Letter to Ms. Lynn Penman, U.S. DOJ, and Ms. Mary Rugala, U.S. EPA, from Mr. William Thompson, Law Offices of Eugene E. Dice, re: Request for consideration of Andgrow Fertilizer as a de minimis party, 6/13/95. P. AND0001-AND0009. A May 27, 1981, letter to Mr. Bill Bryant, Keystone Sanitation Co., from Mr. Donald Lott, Pennsylvania Department of Agriculture; a March 12, 1986, letter to Mr. Tim Travers, U.S. EPA, from Mr. Jack Anderson, Andgrow Fertilizer, Inc.; and a June 13, 1995, affidavit of Mr. Jack Anderson, Andgrow Fertilizer, are attached.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Andgrow Fertilizer, 1/18/96. P. AND0010-AND0010.
- 3. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Andgrow Fertilizer, 1/19/96. P. AND0011-AND0017.
- 4. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Andgrow Fertilizer, 9/2/97. P. AND0018-AND0018.
- 5. U.S. EPA file pertaining to CERCLA Section 104(e) information requests and responses for Andgrow Fertilizer, 3/8/86 2/12/91. P. EPA003916-EPA003926.

## Black Shutter Shops, Inc.

- 1. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Black Shutter Shops, Inc., 1/25/96. P. BBS0001-BBS0017. Documents submitted with the questionnaire are attached.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Black Shutter Shops, Inc., 1/25/96. P. BBS0018-BBS0018.
- 3. Letter to Ms. Carolyn Lane-Wenner, U.S. EPA, from Ms. Robyn Katzman-Bowman, Mette, Evans & Woodside, re: Response to EPA's August 22, 1997, request for additional information concerning the EPA questionnaire, 9/4/97. P. BBS0019-BBS0020.

- 4. Affidavit of Mr. Clyde F. Myers, Black Shutter Shops, Inc., 7/17/98. P. BBS0021-BBS0022.
- 5. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Black Shutter Shop, 7/17/98. P. BBS0023-BBS0023.

# Brandt Tool & Die Co., Inc.

- 1. Letter from Mr. R. Lee Bixler, Brandt Tool & Die Co., Inc., re: Transmittal of invoices documenting the service from Keystone Sanitation Co., Inc. from April 9, 1985, to June 1, 1991, 1/2/96. P. BTD0001-BTD0072. The invoices and an April 18, 1996, summary of the disposal of waste are attached.
- Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Brandt Tool & Die Co., Inc., 1/3/96. P. BTD0073-BTD0078.
- 3. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Brandt Tool & Die Co., Inc., 1/26/96. P. BTD0079-BTD0079.
- 4. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Brandt Tool & Die Co., Inc., 7/20/98. P. BTD0080-BTD0080.

#### Carl E. Frantz, Inc.

- 1. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Carl E. Frantz, Inc., 2/2/96. P. CEF0001-CEF0006.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Carl E. Frantz, Inc., 2/2/96. P. CEF0007-CEF0007
- 3. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Carl E. Frantz, Inc., 7/9/98. P. CEF0008-CEF0008.

#### Castle Hill Trailer Park

1. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Castle Hill Trailer Park, 1/17/96. P. CHT0001-CHT0006.

- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Castle Hill Trailer Park, 1/17/96. P. CHT0007-CHT0007.
- 3. Letter to Ms. Molly Hall, U.S. DOJ, from Mr. Gary Hartman, Hartman & Yannetti, Attorneys at Law, re: Response to EPA's request for additional information concerning the EPA questionnaire, submitted for Castle Hill Trailer Park, 10/30/96. P. CHT0008-CHT0008.
- 4. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Castle Hill Trailer Park, 9/3/97. P. CHT0009-CHT0009.

#### Clark's Body Shop, Inc.

- 1. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Clark's Body Shop, Inc., 1/30/96. P. CBS0001-CBS0005.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Clark's Body Shop, Inc., 2/16/96. P. CBS0006-CBS0006.
- 3. Affidavit of Mr. Clark Smith, Clark's Body Shop, Inc., 4/19/96. P. CBS0007-CBS0007.
- 4. Letter to Mr. David Garrison, Stevens & Lee, from Ms. Victoria van Roden, U.S. EPA, re: Request for additional information concerning the EPA questionnaire, 10/17/96. P. CBS0008-CBS0009. A list of five questions is attached.
- 5. Letter to Ms. Molly Hall, U.S. DOJ, from Mr. Mark Jay Miller, Stevens & Lee, re: Response to EPA's October 17, 1996, request for additional information, 10/31/96. P. CBS0010-CBS0012. A list of responses to EPA's five questions and an October 31, 1996, facsimile transmittal memorandum to Ms. Molly Hall, U.S. DOJ, from Mr. Mark Jay Miller, Stevens & Lee, are attached.
- 6. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Clark's Body Shop, 7/15/98. P. CBS0013-CBS0013.

#### Columbia Gas of Pennsylvania, Inc.

- 1. Transmittal letter and questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Columbia Gas of Pennsylvania, Inc., 1/19/96. P. CGP0001-CGP0007.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Columbia Gas of Pennsylvania, Inc., 1/19/96. P. CGP0008-CGP0008.
- 3. Revised De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Columbia Gas of Pennsylvania, Inc., 3/29/96.
  P. CGP0009-CGP0011. A transmittal letter to Ms. Molly Hall, U.S. DOJ, from Mr. John Shailer, Columbia Gas of Pennsylvania, Inc. is attached.
- 4. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Columbia Gas of Pennsylvania, Inc., 9/23/97. P. CGP0012-CGP0012.
- 5. U.S. EPA file pertaining to CERCLA Section 104(e) information requests and responses for Columbia Gas of Pennsylvania, Inc., 7/1/88 7/14/88. P. EPA004248-EPA004258.

#### Clair Ditzler

- 1. Transmittal letter and questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Clair Ditzler, 6/25/96. P. DIT0001-DIT0007.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Clair Ditzler, 6/25/96. P. DIT0008-DIT0008.
- 3. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Clair Ditzler, 6/25/96. P. DIT0009-DIT0009.

# Edgewood Bowl

- 1. Transmittal letter and questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Edgewood Bowl, 6/8/96. P. EDG0001-EDG0073. Documents submitted with the questionnaire are attached.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Edgewood Bowl, 6/8/96. P. EDG0074-EDG0074.

- 3. Letter to Mr. David Garrison, Stevens & Lee, from Ms. Victoria van Roden, U.S. EPA, re: Request for additional information concerning the EPA questionnaire, 10/31/96. P. EDG0075-EDG0076.
- 4. Letter to Ms. Molly Hall, U.S. DOJ, from Mr. Mark Jay Miller, Stevens & Lee, re: Response to EPA's October 31, 1996, request for additional information concerning the EPA questionnaire, submitted for Edgewood Bowl, 11/21/96. P. EDG0077-EDG0078. The responses are attached.
- 5. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Edgewood Bowl, 9/11/97. P. EDG0079-EDG0079.

# Fellowes Manufacturing Company

- 1. Transmittal letter and questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Fellowes Manufacturing Company, 1/29/96. P. FEL0001-FEL0015. Documents submitted with the questionnaire are attached.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Fellowes Manufacturing Company, 1/29/96. P. FEL0016-FEL0016.
- 3. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Fellowes Manufacturing Company, 9/10/97. P. FEL0017-FEL0017.
- 4. U.S. EPA file pertaining to CERCLA Section 104(e) information requests and responses for Fellowes Manufacturing Company, 12/31/84 7/14/88. P. EPA007674-EPA007865.

# Fetters Orchards

- 1. Transmittal letter and questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Fetters Orchards, 4/25/96. P. FET0001-FET0009.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Fetters Orchards, 4/25/96. P. FET0010-FET0010.

- 3. Letter to Mr. Scott Wyland and Ms. Susan Smith, The Law Firm of Malatesta, Hawke & McKeon, from Mr. Benjamin Lammie, U.S. EPA, re: Request for additional information concerning the EPA questionnaire, 10/18/96. P. FET0011-FET0012.
- 4. Letter to Ms. Molly Hall, U.S. DOJ, from Ms. Susan Smith, The Law Firm of Malatesta, Hawke & McKeon, re: Response to EPA's October 18, 1996, request for additional information concerning the EPA questionnaire, submitted for Fetters Orchards, 10/30/96. P. FET0013-FET0014.
- 5. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Fetters Orchard, 9/11/97. P. FET0015-FET0015.

## Genova's Pizza

- Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Genova's Pizza, 2/29/96.
   P. GEN0001-GEN0005.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Genova's Pizza, 2/29/96. P. GEN0006-GEN0006.
- 3. Letter to Ms. Molly Hall, U.S. DOJ, from Mr. Steven Stambaugh, Blakey, Yost, Bupp & Schaumann Law Offices, re: Transmittal of questionnaire responses on behalf of Genova's Pizza, 4/15/96. P. GEN0007-GEN0011. The responses are attached.
- 4. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Genova's Pizza, 9/11/97. P. GEN0012-GEN0012.

#### Gettysburg Village Green Nursing Center

- Transmittal letter and questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Gettysburg Village Green Nursing Center, 1/19/96.
   P. GVG0001-GVG0043. Documents submitted with the questionnaire are attached.
- De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Gettysburg Village Green Nursing Center, 1/19/96. P. GVG0044-GVG0044.

- 3. Letter to Ms. Patty Miller, U.S. EPA, from Mr. David Getz, Wix, Wenger & Weidner Attorneys at Law, re: Transmittal of a sworn statement of Richard Breighner, Gettysburg Village Green Nursing Center, stating how infectious waste from the facility was disposed, 5/6/96. P. GVG0045-GVG0049. An April 18, 1996, sworn statement of Mr. Richard Breighner, and a September 1, 1988, summary of Omega Medical Laboratories procedures for the disposal of infectious waste are attached.
- 4. Letter to Ms. Patty Miller, U.S. EPA, from Mr. David Getz, Wix, Wenger & Weidner Attorneys at Law, re: Request for information concerning the status of Gettysburg Village Green Nursing Center's eligibility for de micromis settlement, 10/9/96. P. GVG0050-GVG0051.
- 5. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Gettysburg Village Green Nursing Center, 8/8/97. P. GVG0052-GVG0052.

# <u>Greg's Pizza</u>

- Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Greg's Pizza, 1/25/96.
   P. GRE0001-GRE0043. Documents submitted with the questionnaire are attached.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Greg's Pizza, 1/25/96. P. GRE0044.
- 3. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Hanover Borough, 2/15/96. P. GRE0045-GRE0055. Documents submitted with the questionnaire are attached.
- 4. Letter to Mr. Gregory Bair, Greg's Pizza, from Mr. Leo Mullin, U.S. EPA, re: Request for Greg's Pizza to reexamine the volume estimate provided in its De Micromis Party Certification at the Keystone Sanitation Landfill Site, 7/21/97. P. GRE0056-GRE0058. Undated volume estimates are attached.

- 5. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Greg's Pizza, 7/28/97. P. GRE0059-GRE0078. A list of waste generator candidates is attached.
- 6. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Greg's Pizza, 7/28/97. P. GRE0079-GRE0079.
- 7. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Greg's Pizza, 9/3/97. P. GRE0080-GRE0080.

#### Hotel Hanover, Inc.

- 1. Transmittal letter and questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Hotel Hanover, Inc., 1/19/96. P. HHI0001-HHI0007.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Hotel Hanover, Inc., 1/19/96. P. HHI0008-HHI0008.
- 3. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Hotel Hanover, Inc., 2/15/96. P. HHI0009-HHI0024. Documents submitted with the questionnaire are attached.
- 4. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Hotel Hanover, 10/30/96. P. HHI0025-HHI0025.

# Mackley's Exxon

- 1. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Mackley's Exxon, 2/7/96. P. MAC0001-MAC0006.
- 2. De Micromis Party Certification, concerning the Keystone Sanitation Landfill Site, submitted for Mackley's Exxon, 2/7/96. P. MAC0007-MAC0007.
- 3. Letter to Ms. Susan Smith and Mr. Scott Wyland,
  Malatesta, Hawke & McKeon, from Mr. Joe Tieger, U.S.
  EPA, re: Request for additional information concerning
  the EPA questionnaire, 4/18/96. P. MAC0008-MAC0012. A
  list of questions concerning vehicle service waste and
  commercial fruit growing operations and handwritten
  responses to the EPA questions are attached.

4. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Mackley's Exxon, 7/13/98. P. MAC0013-MAC0013.

#### Matteson Kitchens

- 1. Keystone Screening Sheet, concerning Matteson Kitchens, 3/1/96. P. MAK0001-MAK0001.
- 2. Declaration of Fred Matteson, Civil Action No. 1:CV-93-1482, 8/29/97. P. MAK0002-MAK0002.
- 3. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Matteson Kitchens, 2/21/98. P. MAK0003-MAK0043. Documents submitted with the questionnaire are attached.
- 4. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Matteson Kitchens, 2/21/98. P. MAK0044-MAK0044.
- 5. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Matteson Kitchens, 7/13/98. P. MAK0045-MAK0045.

## Maurice R. Zent Estate

- 1. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Maurice R. Zent Estate, 9/16/97. P. MZE0001-MZE0019. Documents submitted with the questionnaire are attached.
- 2. Letter to Ms. Molly Hall and Ms. Patricia Miller, U.S. EPA, from Ms. Amber Dahlgreen Curtis, Dulany & Leahy Attorneys at Law (Dulany & Leahy), re: Additional information concerning waste removal from the residential rental properties owned by Mr. Zent, 9/18/97. P. MZE0020-MZE0021.
- 3. Letter to Ms. Amber Dahlgreen Curtis, Dulany & Leahy, from Ms. Patricia Miller, U.S. EPA, re: Transmittal of a certification and a consent decree, concerning de micromis settlement, for Ms. Zent's review and execution, 8/17/98. P. MZE0022-MZE0022.
- 4. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Maurice R. Zent Estate, 8/27/98. P. MZE0023-MZE0023.

5. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Maurice R. Zent Estate, 8/27/98. P. MZE0024-MZE0024.

#### Midas Muffler of Hanover PA

- 1. Transmittal letter and questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Midas Muffler of Hanover PA, 1/18/96. P. MMH0001-MMH0018. Documents submitted with the questionnaire are attached.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Midas Muffler of Hanover PA, 1/18/96. P. MMH0019-MMH0019.
- 3. Letter to Mr. Alan Cashman, Alan M. Cashman Law Offices, from Ms. Molly Hall, U.S. DOJ, re: Request for additional information concerning the EPA questionnaire, 11/5/96. P. MMH0020-MMH0021.
- 4. Letter to Ms. Molly Hall, U.S. DOJ, from Mr. Alan Cashman, Alan M. Cashman Law Offices, re: Response to EPA's November 5, 1996, request for additional information concerning the EPA questionnaire, submitted for Midas Muffler of Hanover PA, 11/7/96. P. MMH0022-MMH0024.
- 5. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Midas Muffler of Hanover PA, 9/3/97. P. MMH0025-MMH0025.

# O.C. Rice, Inc.

- 1. Transmittal letter and questionnaire concerning the Keystone Sanitation Landfill Site, submitted for O.C. Rice, Inc., 1/17/96. P. OCR0001-OCR0066. Documents submitted with the questionnaire are attached.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for O.C. Rice, 1/17/96. P. OCR0067-OCR0067.

- 3. Letter to Mr. Joe Tieger, U.S. EPA, from Mr. Adam Schultz, Devorsetz, Stinziano, Gilberti, Heintz & Smith, P.C., re: Response to EPA's April 18, 1996, request for additional information, 4/22/96. P. OCR0068-OCR0069. An April 18, 1996, response to vehicle and agricultural equipment service waste questions is attached.
- 4. Declaration of William L. Rice, Civil Action No. 1:CV-93-1482, 8/26/96. P. OCR0070-OCR0070.
- 5. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for O.C. Rice, Inc., 7/11/98. P. OCR0071-OCR0071.

# Olinger Apartments (Estate of Mae E. Olinger)

- 1. Transmittal letter and questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Olinger Apartments, 1/15/96. P. OLIO001-OLIO007.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Olinger Apartments, 1/15/96. P. OLI0008-OLI0008.
- 3. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Olinger Apartments, 7/16/98. P. OLI0009-OLI0009.

#### Penn-Mar Casting, Inc.

- Letter to Ms. Mary Rugala, U.S. EPA, and Ms. Lynn Penman, U.S. DOJ, from Ms. E. Lynne Hirsch, Duane, Morris & Heckscher Attorneys at Law, re: Request for consideration of Penn-Mar Casting, Inc. as a de minimis party, 6/14/95. P. PMC0001-PMC0084. The following are attached:
  - a) Preliminary Volumetric Database Detail
     Transaction Report for the Period January 1,
     1978, through April 30, 1990;

- b) a March 21, 1995, Affidavit of Henry N. Laughman;
- c) a March 21, 1995, Affidavit of Joseph F. Gross;
- d) a March 21, 1995, Affidavit of John F. Lemmerman;
- e) a March 21, 1995, Affidavit of Robert W. Nagle;
- f) an undated Order Authorizing Sales of Assets of Debtor's Penn-Mar Foundry Division Free and Clear of Liens, Encumbrances and Other Interests.
- Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Penn-Mar Casting, Inc., 1/30/96. P. PMC0085-PMC0172. Documents submitted with the questionnaire are attached.
- 3. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Penn-Mar Casting, Inc., 1/30/96. P. PMC0173-PMC0173.
- 4. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Penn-Mar Casting, Inc., 9/5/97. P. PMC0174-PMC0174.

## R & L Orchards

- Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for R&L Orchards, 2/20/96.
   P. RLO0001-RLO0194. Documents submitted with the questionnaire are attached.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for R&L Orchards, 2/20/96. P. RLO0195-RLO0195.
- 3. Letter to Ms. Carolyn Lane-Wenner, U.S. EPA, from Mr. Arthur Rice, R&L Orchards, re: Response to EPA's August 22, 1997, request for additional information,

- 9/3/97. P. RLO0196-RLO0198. A September 3, 1997, transmittal letter to Ms. Carolyn Lane-Wenner, U.S. EPA, from Ms. Jane Schussler, Stock and Leader, is attached.
- 4. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for R & L Orchards, 7/18/98. P. RLO0199-RLO0199.

#### Saltzgiver's, Inc.

- 1. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Saltzgiver's, Inc., 2/23/96. P. SAL0001-SAL0006.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Saltzgiver's, Inc., 2/23/96. P. SAL0007-SAL0007.
- 3. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Saltzgiver's, Inc., 4/29/96. P. SAL0008-SAL0013. The following are attached:
  - a) a March 12, 1997, transmittal memorandum to Ms. Patty Miller, U.S. EPA, from Ms. Robyn Katzman Bowman, Mette, Evans & Woodside;
  - a January 17, 1997, letter to Ms. Molly Hall,
     U.S. DOJ, from Ms. Robyn Katzman Bowman,
     Mette, Evans & Woodside Attorneys at Law;
  - c) an April 29, 1996, letter to Ms. Molly Hall, U.S. DOJ, from Mr. Steven Stambaugh, Blakey, Yost, Bupp & Schaumann Law Offices;
  - d) an April 19, 1996, Affidavit of Mr. William Saltzgiver.

# Shipley Oil Co.

- 1. Questionnaire concerning the Keystone Sanitation Landfill site, submitted for Shipley Oil Co., 1/16/96. P. SHI0001-SHI0006.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Shipley Oil

- Co., 2/16/96. P. SHI0007-SHI0007.
- 3. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Shipley Oil Co., 9/18/97. P. SHI0008-SHI0008.

## Snyder's Market

- 1. Transmittal letter and questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Snyder's Market, Inc., 10/31/96. P. SNY0001-SNY0012. Documents submitted with the questionnaire are attached.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Snyder's Market, 10/31/96. P. SNY0013-SNY0013.
- 3. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Snyder's Market, 9/2/97. P. SNY0014-SNY0014.

# Swinn Rentals

- 1. Transmittal letter and questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Swinn Rentals, 2/29/96. P. SWN0001-SWN0021. Documents submitted with the questionnaire are attached.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Swinn Rentals, 2/29/96. P. SWN0022-SWN0022. Documents submitted with the questionnaire are attached.
- 3. Letter to Ms. Molly Hall, U.S. DOJ, from Mr. Steven Sambaugh, Blakey, Yost, Bupp & Schaumann Law Offices, re: Facts concerning the defense of Swinn Rentals in the Keystone Sanitation Landfill case, 4/26/96.
  P. SWN0023-SWN0025. An April 26, 1996, facsimile transmittal cover letter is attached.
- 4. Fourth Party Defendant Swinn's Rentals' Responses to Uniform Interrogatories, 5/8/96. P. SWN0026-SWN0039. A May 10, 1996, transmittal letter to Ms. Molly Hall, U.S. DOJ, from Mr. Steven Stambaugh, Blakey, Yost, Bupp & Schaumann Law Offices is attached.
- 5. Fourth Party Defendant Swinn's Rentals' Responses to Uniform Request for Production of Documents, 5/8/96.

- P. SWN0040-SWN00225. Two photographs of the rented apartments and receipts of service are attached.
- 6. Memorandum to Mr. Chris Corbett from Mr. Carl Swinn, Swinn Rentals, re: Swinn Rentals' concern with not being selected for EPA's tier 1 or tier 2 settlement, 5/12/96. P. SWN00226-SWN00236.
- 7. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Swinn Rentals, 10/29/96. P. SWN00237-SWN00238. A November 5, 1996, transmittal letter is attached.
- 8. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Swinn's Rentals', 9/5/97. P. SWN00239-SWN00239.
- 9. Fourth Party Defendant Swinn's Rentals' Initial Disclosures to Fourth-Party Plaintiffs, (undated.) P. SWN00240-SWN00241.

# Tevis Oil, Inc.

- 1. Transmittal letter and questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Tevis Oil, Inc., 1/19/96. P. TEV0001-TEV0024. Documents submitted with the questionnaire are attached.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Tevis Oil, Inc., 1/19/96. P. TEV0025-TEV0025.
- 3. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Tevis Oil, Inc., 9/4/97. P. TEV0026-TEV0026.

## Thomas Brothers Country Store

- 1. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Thomas Brothers Country Store, 8/14/96. P. TBC0001-TBC0006.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Thomas Brothers Country Store, 8/14/96. P. TBC0007-TBC0007.
- 3. Letter to Mrs. Marion Harbaugh, Thomas Brothers Country Store, from Ms. Victoria van Roden, U.S. EPA, re:

- Request for additional information concerning the EPA questionnaire and transmittal of certification for de micromis party, 11/1/96. P. TBC0008-TBC0009.
- 4. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Thomas Brothers Country Store, 11/6/96. P. TBC0010-TBC0010.
- 5. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Thomas Brothers Country Store, 11/18/96 [sic]. P. TBC0011-TBC0011.
- 6. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Thomas Brothers Country Store, 9/1/97. P. TBC0012-TBC0012.

# Thunderhead Bowling Lanes, Inc.

- 1. Transmittal letter and questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Thunderhead Bowling Lanes, Inc., 1/22/96. P. TBL0001-TBL0007.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Thunderhead Bowling Lanes, Inc., 1/22/96. P. TBL0008-TBL0008.
- 3. Letter to Ms. Molly Hall, U.S. DOJ, from Mr. David Loder, Duane, Morris & Heckscher Attorneys at Law, re: Thunderhead Bowling Lanes, Inc. response to the EPA's October 17, 1996, questionnaire, 12/3/96. P. TBL0009-TBL0010.
- 4. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Thunderhead Bowling Lanes, Inc., 9/8/97. P. TBL0011-TBL0011.

#### Village Pet Shoppe

1. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Village Pet Shoppe, 1/15/96. P. VPS0001-VPS0023. Documents submitted with the questionnaire are attached.

- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Village Pet Shoppe, 1/15/96. P. VPS0024-VPS0024.
- 3. Letter to Ms. Robyn Katzman-Bowman, Mette, Evans & Woodside, from Ms. Carolyn Lane-Wenner, U.S. EPA, re: Request for additional information concerning the EPA questionnaire and transmittal of certification for de micromis party, 8/22/97. P. VPS0025-VPS0028. A question regarding medical waste and a certification for de micromis party are attached.
- 4. Letter to Mrs. Carolyn Lane-Wenner, U.S. EPA, from, Ms. Robyn Katzman-Bowman, Mette, Evans & Woodside, re: Response to EPA's August 22, 1997, request for additional information, 9/12/97. P. VPS0029-VPS0030. A September 12, 1997, facsimile transmittal memorandum to Ms. Carolyn Lane-Wenner, U.S. EPA, from Ms. Robyn Katzman-Bowman, Mette, Evans & Woodside, is attached.
- 5. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Village Pet Shop, 7/17/98. P. VPS0032-VPS0032.

# Westminster Auto Parts, Inc.

- 1. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for Westminster Auto Parts, Inc., 1/29/96. P. WAP0001-WAP0070. Documents submitted with the questionnaire are attached.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for Westminster Auto Parts, Inc., 1/29/96. P. WAP0071-WAP0071.
- 3. Letter to Ms. Molly Hall, U.S. DOJ, from Ms. E. Lynne Hirsch, Duane, Morris & Heckscher Attorneys at Law, re: Confirmation of recent telephone conversation, 5/17/96. P. WAP0072-WAP0072.
- 4. Letter to Ms. Molly Hall, U.S. DOJ, from Mr. David Loder, Duane, Morris & Heckscher Attorneys at Law, re: Response to EPA's October 31, 1996, request for more information, 12/3/96. P. WAP0073-WAP0074.
- 5. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for Westminster Auto Parts, Inc., 9/9/97. P. WAP0075-WAP0075.

# York Street Treat

- 1. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for York Street Treat, 12/22/95. P. YST0001-YST0006.
- 2. De Micromis Party Certification concerning the Keystone Sanitation Landfill Site, submitted for York Street Treat, 12/22/95. P. YST0007-YST0007.
- 3. Questionnaire concerning the Keystone Sanitation Landfill Site, submitted for York Street Treat, 1/2/96. P. YST0008-YST0014.
- 4. Executed Signature Page for the Keystone Sanitation Landfill Site De Micromis Consent Decree, submitted for York Street Treat, 9/8/97. P. YST0015-YST0015.